

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:)	
)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> , ¹)	Case No. 24-55507 (PMB)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket Nos. 433, 471, and 486

**JOINDER OF TIX 33433 LLC TO THE (I) DEBTORS’ OBJECTION
TO RECOVERY CORP.’S MOTION TO ESTABLISH STANDING
TO CHALLENGE FINAL DIP FINANCING ORDER AND (II) OMEGA
PARTIES OPPOSITION TO RECOVERY CORP.’S MOTION TO ESTABLISH
STANDING TO CHALLENGE FINAL DIP FINANCING ORDER**

TIX 33433 LLC (“TIX 33433”), a DIP Lender² in the above-captioned bankruptcy cases, by and through its undersigned counsel, respectfully submits this joinder (the “Joinder”) to the (i) *Debtors’ Objection to Recovery Corp.’s Motion to Establish Standing to Challenge Final DIP Financing Order* [Docket No. 486] (the “Debtors’ Response”) and (ii) *Response of the Omega Parties in Opposition to Recovery Corp.’s Motion to Establish Standing to Challenge Final DIP Financing Order* [Docket No. 471] (the “Omega Parties’ Response”, together with the Debtors’ Response, the “Responses”). Each of the Responses and this Joinder are being submitted in opposition to *Recovery Corp.’s Motion to Establish Standing to Challenge the Final DIP*

¹ The last four digits of LaVie Care Centers, LLC’s federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://veritaglobal.net/lavie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

² Capitalized terms used but not otherwise defined in this Joinder will have the meanings ascribed to them in the *Final Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief* [Docket No. 189].



Financing Order [Docket No. 433] (the “Challenge Motion”). In support of this Joinder, TIX 33433 respectfully states as follows:

1. TIX 33433 joins in the Responses, incorporates the facts and arguments from the Responses in this Joinder, and respectfully requests that the Court deny the Challenge Motion and grant such other and further relief as may be just and proper.

2. TIX 33433 reserves all rights to amend or supplement this Joinder and to raise additional arguments at, or prior to, the hearing on the Challenge Motion.

Respectfully submitted,

This 2nd day of October, 2024.

DLA PIPER LLP (US)

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Counsel for TIX 33433 LLC

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing **Joinder of TIX 33433 LLC to the (I) Debtors' Objection to Recovery Corp.'s Motion to Establish Standing to Challenge Final DIP Financing Order and (II) Omega Parties Opposition to Recovery Corp.'s Motion to Establish Standing to Challenge Final DIP Financing Order** using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program.

This 2nd day of October, 2024.

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